IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ERIC S. MCGILL, JR.,

Plaintiff, : No. 3:19-cv-1712

v. : (SAPORITO, M.J.)

TIMOTHY L. CLEMENTS,

Deputy Warden of Operations of Lebanon

County Correctional Facility;

MICHAEL OTT, Captain of Security of

Lebanon County Correctional Facility;

ROBERT J. KARNES, Warden of Lebanon:

County Correctional Facility;

LEBANON COUNTY;

Defendants.

LEONTTAYY AMIR PRATT and LAMONT ROBINSON,

Plaintiffs,

v.

MICHAEL OTT, Deputy Warden of Operations, Lebanon County Correctional Facility; TINA LITZ, Deputy Warden of Treatment, Lebanon County Correctional Facility; ROBERT J. KARNES, Warden, Lebanon Correctional Facility; JODEPH WHEELER, Captain of Security, Lebanon County Correctional Facility; LEBANON COUNTY;

Defendants.

No. 1:20-cv-0171

(CONNER, J.)

STIPULATION CONSOLIDATING RELATED CASES

This stipulation is entered into by Plaintiffs Eric S. McGill, Jr., Leonttayy Amir Pratt, and Lamont Robinson (collectively, "Plaintiffs") and Defendants Lebanon County, Timothy L. Clements, Michael Ott, Robert J. Karnes, Tina Litz, and Joseph Wheeler (collectively, "Defendants") by and through their respective counsel.

IT IS HEREBY STIPULATED AND AGREED as follows:

- 1. The matter docketed as *McGill v. Clements, et al.*, No. 3:19-cv-1712, is related to the matter docketed as *Pratt, et al. v. Ott, et al.*, No. 1:20-cv-0171, and the two matters share common issues of law and fact. Both actions allege violations of the Plaintiffs' rights under the First and Fourteenth Amendments and the Religious Land Use and Institutionalized Persons Act, and both involve Defendants' enforcement of the same policy of the Lebanon County Correctional Facility.
- 2. Pursuant to Fed. R. Civ. P. 42, the parties submit that these two cases should be consolidated into No. 1:20-cv-0171 for all purposes and proceedings before this Court.
- 3. This stipulation is without prejudice to any other rights that any party may have.

Respectfully submitted,

/s/ Alexandra Morgan-Kurtz

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/s/ Matthew A. Feldman

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Counsel for Plaintiffs

<u>/s/ Matthew R. Clayberger</u>

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Matthew A. Feldman, hereby certify that on May 17, 2021, I caused to be served a true and correct copy of the foregoing Stipulation Consolidating Related Cases upon Defendants' counsel via the Court's ECF system.

/s/ Matthew A. Feldman

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